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19
20 **UNITED STATES DISTRICT COURT**
21 **NORTHERN DISTRICT OF CALIFORNIA**
22 **SAN JOSE DIVISION**

23 RED HAT, INC.,

24 Plaintiff,

25 v.

26 VIRTAMOVE CORP.,

27 Defendant.

28 Case No. 5:24-cv-04740-PCP

**STIPULATION TO CONTINUE
INITIAL CASE MANAGEMENT
CONFERENCE**

Judge Hon. P. Casey Pitts
Location: Courtroom 8, 4th Floor

1 Pursuant to Civil L.R. 6-1 and your Honor's Standing Order for Civil Cases, Plaintiff Red
2 Hat, Inc. and Defendant VirtaMove Corp. stipulate and request a continuance of the Initial Case
3 Management Conference from January 14, 2025 at 1 p.m. to February 6, 2025 at 10 a.m.,
4 approximately sixty days after the hearing on VirtaMove's motion to dismiss this action.

5 The parties previously stipulated to a similar extension of the initial CMC to January 16,
6 2025, which the Court granted. Dkt. No. 33. At the time of that prior stipulation, the hearing on
7 the motion to dismiss was set for November 14, 2024. *Id.* Since that stipulation was entered, the
8 Court reset the motion to dismiss hearing to December 12, 2024 (Dkt. No. 38) and reset the initial
9 CMC to January 14, 2025 (Dkt. No. 41). The parties therefore seek a modest additional extension
10 of the initial CMC to comport with Your Honor's practice of allowing the parties to request an
11 extension of "the initial CMC [to] 60 days or more after the hearing." Judge Pitts' Standing Order
12 for Civil Cases at 3.

13 This extension is not sought for purposes of delay, but rather, in the event this case is not
14 dismissed, to ensure the parties have sufficient time to confer pursuant to Rule 26(f) and this
15 Court's local rules, as well as to prepare and submit to the Court a fulsome case management
16 report. This extension will not affect any other pending case deadlines.

17 Dated: December 9, 2024

Respectfully submitted,

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13 DATED: December 9, 2024

14 Respectfully submitted,

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